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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON, PORTLAND DIVISION

RILEY POOR,	)	Case No. 3:13-cv-00107-SI
	)	
Plaintiff,	)	**JOINT MOTION FOR MODIFICATION**
	)	**OF PRETRIAL DATES**
vs.	)	
	)	
FRONTIER AIRLINES, INC.,	)	
	)	
Defendant.	)	

I.   RULE 7-1(a)(I)(a) CERTIFICATION

The parties have conferred pursuant to Rule 7-1(a)(I)(A) and join in the following

motion for modification of the pretrial dates.

II.   MOTION FOR MODIFICATION OF PRETRIAL DATES.

The parties jointly move for a modification of the pretrial dates as shown below. The

parties have completed written discovery and Plaintiff's deposition, and they have scheduled the

depositions of former Frontier employees John Brannon and Alaeldin Omer for February 5,

2014. The scheduling of the Brannon and Omer depositions was delayed by the extended period

of time spent locating and contacting the two witnesses. While Mr. Omer currently resides in

Salt Lake City, Utah, Frontier has arranged for him to travel to Portland, Oregon to appear for his

deposition on February 5, 2014. Frontier has requested the deposition of Plaintiff's treating

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physician, Dr. Jennifer Lawler. The parties are in the process of arranging that deposition. Once

the above-referenced depositions have been completed, the parties anticipate engaging in

settlement discussions either informally, through private mediation or utilizing a settlement

judge. Notwithstanding, the parties request a modification of the current scheduling order in

order to complete fact discovery and posture this case for settlement discussions. The parties

expect that the modification of dates outlined below will permit the efficient conclusions of fact

discovery, and for those reasons the parties ask that the court adjust the pretrial schedule as

follows:

EVENT	CURRENT DATE	PROPOSED NEW DATE
Fact Discovery Closes	1/29/2014	3/31/2014
Plaintiff's Expert Disclosure Due	2/4/2014	4/2/2014
Defendant's Federal Preemption Motion Due	2/12/2014	4/14/2014
Defendant's Expert Witness Disclosure and Reports Due	4/26/2014	6/26/2014
Plaintiff's Rebuttal Expert Disclosures and Reports Due	5/28/2014	7/28/2014
Joint Status Report Due	6/10/2014	8/11/2014
Dispositive Motions Due	6/10/2014	8/11/2014

Respectfully submitted January 22, 2014.

BRIAN T. MAYE
/s/ Brian T. Maye
Brian T. Maye *(Pro Hac Vice)*
Adler Murphy & McQuillen LLP

Attorneys for Defendant Frontier Air Lines, Inc.

JAMES F. HALLEY. P.C.
/s/ James F. Halley
James F. Halley, OSB #91-175
Attorneys for Plaintiff Riley Poor

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2014, I served the attached JOINT MOTION FOR

MODIFICATION OF PRETRIAL DATES on:

Brian T. Maye
Adler Murphy & McQuillen LLP
20 S. Clark St, 2500
Chicago, IL 60603

Timothy E. Miller
Stuart W. Smith
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by _ X _ electronic filing.

/s/ James F. Halley_____
James F. Halley OSB 91175

The foregoing is a true, correct and complete copy of the original.

/s/_____